

EXHIBIT A

SUM-100

SUMMONS (CITACION JUDICIAL)

**NOTICE TO DEFENDANT: UNITED HEALTH CENTERS OF THE SAN
(AVISO AL DEMANDADO): JOAQUIN VALLEY; IMADE OSAGHAE, PA-C;
SANDRA BRAVO, LVN; DOES 1 to 50, inclusive**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

E-FILED
5/22/2020 8:35 AM
Superior Court of California
County of Fresno
By: A. Rodriguez, Deputy

**YOU ARE BEING SUED BY PLAINTIFF: PARDIS KHANI
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of Fresno
1130 O Street
Fresno, California 93721-2220

CASE NUMBER:
(Número del Caso): 20CECG01502

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: Adam B. Stirrup
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
BARADAT & PABOOJIAN, INC.
720 W. ALLUVIAL AVE., FRESNO, CA 93711

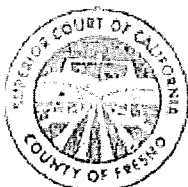
(559) 431-5366

DATE:
(Fecha) 5/22/2020

Clerk, by
(Secretario) _____, Deputy
A. Rodriguez (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
4. ☐ by personal delivery on (date):

Page 1 of 3

PLD-PI-001

SHORT TITLE: KHANI v. UNITED HEALTH CENTERS	CASE NUMBER:
---	--------------

4. ☐ Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person OF THE SAN JOAQUIN VALLEY
- a. ☒ except defendant (name): UNITED HEALTH CENTERS
- (1) ☒ a business organization, form unknown
(2) ☒ a corporation
(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):
(5) ☐ other (specify):
- c. ☐ except defendant (name):
- (1) ☐ a business organization, form unknown
(2) ☐ a corporation
(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):
(5) ☐ other (specify):
- b. ☐ except defendant (name):
- (1) ☐ a business organization, form unknown
(2) ☐ a corporation
(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):
(5) ☐ other (specify):
- d. ☐ except defendant (name):
- (1) ☐ a business organization, form unknown
(2) ☐ a corporation
(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):
(5) ☐ other (specify):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (specify Doe numbers): 1-50 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (specify Doe numbers): 1-50 are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a. ☒ at least one defendant now resides in its jurisdictional area.
b. ☒ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
d. ☐ other (specify):
9. ☐ Plaintiff is required to comply with a claims statute, and
- a. ☐ has complied with applicable claims statutes, or
b. ☐ is excused from complying because (specify):

PLD-PI-001

SHORT TITLE: KHANI v. UNITED HEALTH CENTERS

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☐ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☐ Other (*specify*):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☒ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☒ property damage
- f. ☒ loss of earning capacity
- g. ☐ other damage (*specify*):

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

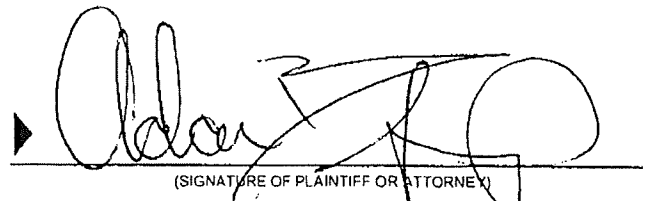
15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

All checked paragraphs of this Complaint and the General Negligence Cause of Action.

Date: May 21, 2020

Adam B. Stirrup

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(2)

SHORT TITLE: KHANI v. UNITED HEALTH CENTERS

CASE NUMBER:

FIRST
(number)**CAUSE OF ACTION—General Negligence**

Page 4

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint*(Use a separate cause of action form for each cause of action.)*

GN-1. Plaintiff (name): PARDIS KHANI

alleges that defendant (name): UNITED HEALTH CENTERS OF THE SAN JOAQUIN VALLEY; IMADE OSAGHAE, PA-C; SANDRA BRAVO, LVN

☒ Does 1 to 50, inclusive

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): or about June 5, 2019 through September 19, 2019

at (place): United Health Centers of the San Joaquin Valley, 1570 7th Street, Sanger, California.

(description of reasons for liability):

Defendants, and each of them, were physicians, surgeons, nurses, physician assistants, clinics, hospitals, and/or health care providers, duly licensed to practice medicine and offer nursing and other services in the State of California, each holding himself or herself out to possess that degree of skill, ability, and learning, common to medical practitioners in the community.

That on or about June 5, 2019, through September 19, 2019, and at all times thereafter, Plaintiff consulted with Defendants, and each of them, for the purpose of obtaining a diagnosis and treatment of an injury, condition, and illness and employed said Defendants, and each of them, to care for and treat Plaintiff and to do those things necessary and proper in said care and treatment. That said Defendants, and each of them, undertook said employment and agreed to do all things reasonable, proper, and necessary in connection therewith, and said Defendants and each of them, thereafter, entered such employment, individually, and by and through their employees, servants, and agents.

Pursuant to said agreement, and on or about June 5, 2019, through September 19, 2019, Plaintiff was examined and underwent treatment for rashes, including a kenalog injections, as well as other diagnostic and therapeutic procedures and, thereafter, continued to be treated and cared for by Defendants, and each of them.

That at all times mentioned herein, Defendants, and each of them, failed to use reasonable care or skill common to medical practitioners in the community and further, failed to use reasonable care in the diagnosis and treatment of said condition, illness, and injury, in that they did not provide Plaintiff with proper treatment or properly refer her for treatment resulting in injury and damage to Plaintiff. At all times each of said Defendants was acting as the agent for each of the other Defendants.

SUPERIOR COURT OF CALIFORNIA • COUNTY OF FRESNO Civil Unlimited Department, Central Division 1130 "O" Street Fresno, California 93724-0002 (559) 457-1900	FOR COURT USE ONLY 5/22/2020 Filed by Court
TITLE OF CASE: Pardis Khani vs. United Health Centers of the San Joaquin Valley	CASE NUMBER: 20CECG01502
NOTICE OF CASE MANAGEMENT CONFERENCE AND ASSIGNMENT OF JUDGE FOR ALL PURPOSES	

To All Parties and their Attorneys of Record: Adam B. Stirrup

This case has been assigned to **Kimberly Gaab**, Judge for all purposes.
 All future hearings will be scheduled before this assigned judge.

You are required to appear at a Case Management Conference on **10/13/2020 at 3:30 PM** in **Department 402** of the court located at **1130 "O" Street, Fresno, California**.


You must comply with the requirements set forth in Fresno Superior Court Local Rule Chapter 2.

Failure to appear at the conference may result in imposition of sanctions, waiver of jury trial, or other adverse consequences.

Defendants: Appearance at the Case Management Conference does not excuse you from having to file your response in proper legal form within 30 days after the Summons is served on you. You could lose the case if you do not file your response on time. If you do not know an attorney, and do not have one, you may call an attorney referral service or a legal aid office (*listed in the phone book*).

DECLARATION

I declare under penalty of perjury under the laws of the State of California that I gave a copy of the **Notice of Case Management and Assignment of Judge for All Purposes** to the person who presented this case for filing.

Date: 5/22/2020 Clerk, by Ashley Rodriguez , Deputy